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8 *Attorneys for Defendants State of California, by and*  
*through the California Highway Patrol, Blackwood,*  
9 *Kee, and Rubalcava*

10 IN THE UNITED STATES DISTRICT COURT  
11 FOR THE CENTRAL DISTRICT OF CALIFORNIA  
12 EASTERN DIVISION  
13

14 **L.C., et al.,**  
15  
16 Plaintiffs,  
17  
18 **v.**  
19  
20 **STATE OF CALIFORNIA, et al.,**  
21 Defendants.  
22

No. 5:22-cv-00949 KK (SHKx)

**STATE DEFENDANTS' NOTICE  
OF MANUAL LODGING OF  
VIDEO/AUDIO EXHIBITS IN  
SUPPORT OF MOTION FOR  
SUMMARY JUDGMENT**

Date: March 20, 2025  
Time: 9:30 a.m.  
Courtroom: 3 (3rd Floor)  
Judge: Hon. Kenly Kiya Kato  
Trial Date: June 2, 2025  
Action Filed: June 7, 2022

23 PLEASE TAKE NOTICE:

24 Pursuant to Local Rule 5-4.2 and 11-5.1, Defendants State of California, by  
25 and through the California Highway Patrol, Blackwood, Kee, and Rubalcava (State  
26 Defendants) are manually lodging the video or audio files listed below, with the  
27 Court, via submission of a USB flash drive because the items are exempt from, and  
28

1 are not conducive to, electronic filing. These items are being submitted as exhibits  
2 in support of the State Defendants' Motion for Summary Judgment.

3 1. Exhibit B: Mobile Video Audio Recording System (MVARs), Part 1, from  
4 the patrol unit Defendant Kee drove on February 17, 2021.

5 2. Exhibit C: MVARs, Part 2, from the patrol unit Defendant Kee drove on  
6 February 17, 2021.

7 3. Exhibit D: MVARs, Part 1, from the patrol unit Defendant Blackwood  
8 drove on February 17, 2021.

9 4. Exhibit E: MVARs, Part 2, from the patrol unit Defendant Blackwood  
10 drove on February 17, 2021.

11 5. Exhibit F: MVARs, Part 3, from the patrol unit Defendant Blackwood  
12 drove on February 17, 2021.

13 6. Exhibit G: MVARs, Part 4, from the patrol unit Defendant Blackwood  
14 drove on February 17, 2021.

15 7. Exhibit H: Cellphone footage that Edward Mangerino recorded on  
16 February 17, 2021, bates stamped COSB001459.

17 8. Exhibit I: Cellphone footage that Erin Mangerino recorded on February 17,  
18 2021, bates stamped COSB001416.

19 9. Exhibit J: Cellphone footage that Betzbeth Gonzalez recorded on February  
20 17, 2021, bates stamped PLAINTIFF 0241.

21 10. Exhibit K: Cellphone footage that Plaintiff Jonathan W. Botten Sr.  
22 recorded on February 17, 2021, bates stamped COSB001469.

23 11. Exhibit L: Audio recorded interview of Plaintiff Annabelle Botten,  
24 conducted on February 17, 2021, bates stamped COSB001379.

25 12. Exhibit M: Audio recorded interview of Plaintiff Jonathan W. Botten, Sr.,  
26 conducted on February 17, 2021, bates stamped COSB001391.

1 Dated: February 20, 2025

Respectfully submitted,

2 ROB BONTA  
3 Attorney General of California  
4 NORMAN D. MORRISON  
Supervising Deputy Attorney General

5 */s/ Diana Esquivel*

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9 *Cal., by and through the Cal.*  
*Highway Patrol, Blackwood, Kee,*  
*and Rubalcava*

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